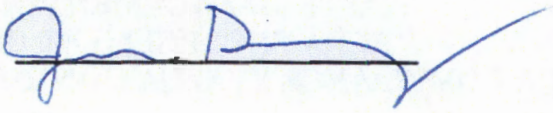
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

WASTE MANAGEMENT DIVISION
RCRA ENFORCEMENT OFFICE
TSCA COMPLIANCE EVALUATION INSPECTION REPORT

Purpose:	TSCA Compliance Evaluation Inspection
Facility:	Clean Harbors Los Angeles, LLC 5756 Alba Street Los Angeles, CA 90058
EPA ID Number:	CAD 050 806 850
Date of Inspection:	August 25, 2011
EPA Representatives:	Jennifer Downey Enforcement Officer (415) 972-3342 downey.jennifer@epa.gov Christopher Rollins Enforcement Officer (415) 947-4166 rollins.christopher@epa.gov
Facility Representatives:	Dave Cochran General Manager (323) 277-2521 Joe Christopher Compliance Manager (310) 835-0775 x 499 Mac Hardaway General Manager – Transformer Services (323) 277-2508 Jesus Vela Operations Supervisor

Edgar Militar
Laboratory Manager

Report Prepared By: Jennifer Downey



Report Date: October 12, 2011

Introduction

On August 25, 2011, U.S. Environmental Protection Agency ("EPA") representatives conducted an unannounced Toxic Substances Control Act ("TSCA") Compliance Evaluation Inspection ("CEI") of Clean Harbors Los Angeles, LLC ("Clean Harbors"), located at 5756 Alba Street, in Los Angeles, California. The purpose of the inspection was to determine Clean Harbors' compliance with the Polychlorinated Biphenyls ("PCBs") regulations under 40 Code of Federal Regulations ("C.F.R.") parts 761, and the California Health and Safety Code ("HSC"), Division 20, Chapter 6.5; and the California Code of Regulations ("C.C.R."), Title 22, Division 4.5.

This inspection report summarizes the events that transpired during the inspection, the observations and findings made by the EPA inspectors, and information received from the facility subsequent to the inspection.

Facility Background

Facility Name	Clean Harbors Los Angeles, LLC ("Clean Harbors")
Established	EPA originally granted this facility location a TSCA Approval under the name Oil Process Company in 1991. On February 15, 2002, the TSCA PCB Approval for the 5756 Alba Street facility location expired. However, the permit has been administratively extended until EPA can complete its review of Clean Harbors' application for permit renewal, which was submitted prior to the permit expiration date.
Number of Employees	25 Employees
Hours of Operation	6:00 am to 10:30 pm (2 shifts)
Filed Notification of PCB Waste Activity Form	This facility location first filed a Notification of PCB Waste Activity Form on January 24, 1990. Clean Harbors submitted an additional Notification of PCB Activity Form notifying EPA of its generator status on July 26, 2007.
Facility Processes	Clean Harbors provides environmental and hazardous waste management services in the United States. The facility specializes in decontamination, emergency response, disposal and recovery services related to hazardous waste and used oil. This location also stores and consolidates PCBs and PCB Equipment destined for disposal at TSCA regulated facilities.
Waste Streams	Used Oil, PCB liquids, PCB Equipment and scrap metal from the processing of Non-PCB and PCB equipment.
PCB Facility Status	PCB Commercial Storage Facility
Last Inspection	EPA Region 9 last conducted a TSCA PCB inspection of the Clean Harbors facility on July 16, 2009. Violations documented in the report included failure to properly mark PCBs and PCB items, failure to include the removal from service dates on PCB containers and manifests, and failure to mark all equipment used for handling PCBs with the PCB M_L label.

Google Earth Aerial View of the Clean Harbors Los Angeles Facility

Photo 1 - Entrance to the Facility

Facility Inspection

On August 25, 2011, EPA representatives arrived at Clean Harbors Los Angeles, California facility at approximately 11:12 am. Two EPA Region 9 inspectors (Ms. Jennifer Downey and Mr. Christopher Rollins) were present during the inspection.

During the in-brief, the inspectors presented their credentials. Mr. Rollins then presented and explained the Notice of Inspection form (Attachment 3a.) and a TSCA Inspection Confidentiality Notice form (Attachment 3b.) to the Clean Harbors representatives.

Under TSCA, the Notice of Inspection form is required to be signed prior to conducting an inspection and the TSCA Confidentiality Notice form outlines Clean Harbors' right to claim PCB materials or documents collected during or after the inspection as TSCA Confidential Business Information ("CBI"). No documents were declared CBI during EPA's inspection. Both EPA and the facility signed both forms and EPA concluded its in-brief.

EPA inspectors conducted a walk-through of the facility and collected eleven surface wipe samples to evaluate Clean Harbors' management of PCBs.

The following summarize the areas inspected and the potential violations found near or adjacent to the Truck Loading Dock, Container Storage Warehouse, and On-Site Laboratory.

Area 1: Truck Loading Dock

The inspectors observed sixteen 55-gallon drums containing PCB waste on pallets in the Truck Loading Dock area that were ready to be shipped offsite (see Photo 2). The out of service date was marked on the top of each drum. In addition, the drums were marked with a PCB M_L label, a hazardous waste label (designating the PCB material as a California-only hazardous waste) and an internal tracking label. The hazardous waste labels and internal tracking labels were each marked with their own dates, which did not correspond with the out of service date. The inspectors noted that all of the hazardous waste labels were marked with an accumulation start date of 8/24/2011 (see Photo 3). According to facility representatives, the hazardous waste labels had been affixed to the drums the day before when Clean Harbors generated the manifest(s) which will accompany the waste when it is shipped offsite for treatment and disposal at another facility. The inspectors expressed concern that Clean Harbors was not entering the out of service date as the hazardous waste accumulation start date.

Photo 2 – Containers in Truck Loading Dock Area

Photo 3 – Hazardous Waste Label Dated 8/24/2011

Area 2: Container Storage Warehouse

Location	Waste Type	Potential Violation	Photo
Warehouse Floor	PCB Wipe Sample CH082511SW-1	None	N/A
Entrance	PCB Wipe Sample CH082511SW-2	None	N/A
Ramp	PCB Wipe Sample CH082511SW-3	None	N/A
Leaky Transformer	PCB Wipe Sample CH082511SW-4	None	4, 5
Bay 1	PCB Wipe Sample CH082511SW-5	None	N/A
Bay 4	PCB Wipe Sample CH082511SW-6	None	N/A
Bay 2	PCB Wipe Sample CH082511SW-7	None	7
Bay 3	PCB Wipe Sample CH082511SW-8	None	8

The inspectors observed 2 leaking transformers in Clean Harbors' Container Storage Warehouse. The first transformer, located in Bay 4, had "330 ppm" written on the side of the transformer (see Photos 4 and 5). EPA collected a PCB wipe sample of the oil on the day of the inspection (Sample CH082511SW-4). However, according to the analytical results, EPA only detected PCBs at 6.5 µg/100 cm^2. The action level for PCB wipe samples under TSCA is 10 µg/100 cm^2. The second leaky transformer was marked as "6 ppm" and was stored in a containment unit in the non-PCB (<50 ppm) storage area of the warehouse.

Photo 4 – Transformer Marked as "330 ppm"

Photo 5 – Liquid on Floor & Pallet

The inspectors observed a metal drum (Drum #24612696) in Bay 3 of the Container Storage Warehouse that had " Assume >500" written on the drum lid by the generator, but did not have a PCB M_L label affixed (see Photo 6). EPA asked that Clean Harbors provide EPA with analytical and profile information for the drum. On October 4, 2011, Clean Harbors sent EPA the requested information (Attachment 4), including laboratory results showing no detectable levels of PCBs in the drum contents.

Photo 6 – Drum #24612696 Marked "Assume > 500"

The inspectors observed 2 big stains on the floor near Clean Harbors's electrical pump in Bay 2 (see Photo 7). EPA collected a PCB wipe sample over one of the stains (Sample CH082511SW-7). According to the analytical results, EPA only detected PCBs at .06 µg/100 cm^2. The inspectors also observed significant staining and residue in the gutter area of Bay 3 (see Photo 8). EPA collected a PCB wipe sample in the gutter area (Sample CH082511SW-8). According to the analytical results, EPA only detected PCBs at .2 µg/100 cm^2.

Photo 7: Wipe Sample Near Pump in Bay 2

Photo 8: Wipe Sample in Dirty Gutter in Bay 3

A total of eight surface wipes (CH082511SW-1 to CH082511SW-8) were collected inside the Container Storage Warehouse. None of the wipe samples exceeded the threshold for unrestricted use under TSCA (10 µg/100 cm^2).

Area 3: Onsite Laboratory

Location	Waste Type	Potential Violation	Photo
Lab Hood #1	PCB Wipe Sample CH082511SW-9	N/A – Field Blank	N/A
Lab Hood #1	PCB Wipe Sample CH082511SW-10	None	N/A
Lab Hood #2	PCB Wipe Sample CH082511SW-11	None	N/A

The inspectors observed 3 containers in the temporary PCB storage area inside the Laboratory (see Photos 9 and 10). A white container, partially filled with PCB oil, was not marked with a PCB M_L label as required. The drum also should be labeled as CA-only hazardous waste. Clean Harbors affixed the appropriate labels prior to the end of the inspection.

Photo 9: Laboratory PCB Storage Area

Photo 10: White PCB Container Not Properly Labeled

A total of three surface wipes (CH082511SW-9 to CH082511SW-11) were collected inside the Laboratory. The analytical results of the wipes were non-detect for PCBs.

Record Review

The inspectors requested that Clean Harbors subsequently provide EPA with an inventory of PCB items on site at the time of the inspection, analytical and profile information for drum 24612696, and analytical information and manifest(s) from decontamination of a PCB tank earlier in the year. Clean Harbors provided the requested information on October 4, 2011 (Attachment 4).

Potential Violation of TSCA PCB Requirements

1. **Failure to Mark PCBs and PCB Items [40 C.F.R. § 761.40(a)(1)].**

Requirements:

TSCA requirement 40 C.F.R. § 761.40(a)(1) states each [PCB Containers] in existence on or after July 1, 1978 shall be marked as illustrated in Figure 1 in § 761.45(a): The mark illustrated in Figure 1 is referred to as M_L throughout this subpart.

Findings:

During the inspection, EPA observed a container of PCB oil in the laboratory which was not properly marked with a PCB M_L label as required under TSCA.

Facility Response:

Clean Harbors documented its return to compliance by affixing a PCB M_L label to the container prior to the end of the inspection. Clean Harbors also re-trained their TSCA facility laboratory teams on all waste standards of operation, including waste container labeling requirements, subsequent to the inspection.

List of Attachments

1. Inspection Photo Log
2. EPA Region 9 Laboratory Analytical Testing Results
3. TSCA Inspection Forms
   a. Notice of Inspection
   b. TSCA Inspection Confidentiality Notice
   c. Receipt for Samples and Documents
   d. Chain of Custody Record
4. Clean Harbors October 4, 2011 Correspondence

ATTACHMENT 1

Photograph Log for EPA's August 25, 2011
Clean Harbors Los Angeles TSCA Inspection

All photographs on this log were taken with a Olympus Tough TG-310 digital camera by Christopher Rollins or Jennifer Downey, RCRA Enforcement Office, EPA Region IX. Please note that each photograph number listed below begins with "P82500".

01. Sign located at the front of the facility
02. Drums in Truck Loading Dock area
03. Close-up of drum in Truck Loading Dock area
04. Hazardous waste label on drum in Truck Loading Dock area (8/24/11 accumulation start date)
05. Top of drum showing out of service date in Truck Loading Dock area
06. Drums in Truck Loading Dock area
07. Top of drum showing out of service date in Truck Loading Dock area
08. Clean Harbors Supplemental Drum Label on drum in Truck Loading Dock area
09. Hazardous waste container near entrance to Container Storage Warehouse
10. Drums near front of Container Storage Warehouse
11. Labels on a drum near the front of Container Storage Warehouse
12. Labels on a drum near the front of Container Storage Warehouse
13. Leaking "330 ppm" transformer
14. Liquid and stains below "330 ppm" leaking transformer
15. Liquid and stains below "6 ppm" leaking transformer
16. "6 ppm" leaking transformer
17. Transformers and containers in TSCA area of Container Storage Warehouse
18. Transformers and containers in TSCA area of Container Storage Warehouse
19. Transformers and containers in TSCA area of Container Storage Warehouse
20. Transformers and containers in TSCA area of Container Storage Warehouse
21. Labels and markings on top of TSCA regulated item in Container Storage Warehouse

22. Hazardous waste labels on non-TSCA PCB items in Container Storage Warehouse

23. Labels on container of potentially PCB contaminated debris in Container Storage Warehouse

24. Drum in Bay 3 of Container Storage Warehouse

25. Drum #24612696 in Bay 3 of Container Storage Warehouse

26. Hazardous waste label on drum in Container Storage Warehouse

27. PCB label on small container in Container Storage Warehouse

28. PCB pump and equipment in Bay 2

29. EPA wipe sample CH082511SW-1

30. EPA wipe sample CH082511SW-2

31. EPA wipe sample CH082511SW-3

32. Clean Harbors wipe sample next to CH082511SW-3

33. EPA wipe sample CH082511SW-4

34. Clean Harbors wipe sample next to CH082511SW-4

35. EPA wipe sample CH082511SW-5

36. EPA wipe sample CH082511SW-6

37. EPA wipe sample CH082511SW-7

38. PCB hose and staining on floor in Bay 2

39. EPA wipe sample CH082511SW-8

40. After EPA wipe sample CH082511SW-8

41. Drums in Bay 3 of Container Storage Warehouse

42. Step can filled with potentially PCB contaminated gloves in Laboratory

43. Containers in Laboratory temporary PCB storage area

44. Containers in Laboratory temporary PCB storage area

45. EPA wipe sample CH082511SW-10

46. EPA wipe sample CH082511SW-11


P8250001


P8250002


P8250003

P8250004


P8250005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P8250010


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P8250039

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P8250045

P8250046

Attachment 2

1108070 FINAL 09 22 11 1535

United States Environmental Protection Agency
Region 9 Laboratory

1337 S. 46th Street Building 201
Richmond, CA 94804

Date: 9/22/2011

Subject: Analytical Testing Results - Project R11R08
SDG: 11238B

From: Brenda Bettencourt, Director
EPA Region 9 Laboratory
MTS-2

To: Jennifer Downey
RCRA Enforcement Office
WST-3

Attached are the results from the analysis of samples from the **Clean Harbors Los Angeles 2011 TSCA Inspection** project. These data have been reviewed in accordance with EPA Region 9 Laboratory policy.

A full documentation package for these data, including raw data and sample custody documentation, is on file at the EPA Region 9 Laboratory. If you would like to request additional review and/or validation of the data, please contact Eugenia McNaughton at the Region 9 Quality Assurance Office.

If you have any questions, please ask for Richard Bauer, the Lab Project Manager at (510)412-2300.

Analyses included in this report:

PCB Aroclors by GC/ECD	PCB Aroclors by GC/ECD

United States Environmental Protection Agency
Region 9 Laboratory
1337 S. 46th Street, Building 201, Richmond, CA 94804
Phone:(510) 412-2300 Fax:(510) 412-2302

Project Manager: Jennifer Downey	**RCRA Enforcement Office**	**SDG:** 11238B
Project Number: R11R08	**75 Hawthorne Street**	**Reported:** 09/22/11 15:35
Project: Clean Harbors Los Angeles 2011 TSCA Inspection	**San Francisco CA, 94105**	

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Collected	Date Received
CH082511SW-1	1108070-01	Wipe	08/25/11 13:16	08/26/11 11:00
CH082511SW-2	1108070-02	Wipe	08/25/11 13:21	08/26/11 11:00
CH082511SW-3	1108070-03	Wipe	08/25/11 13:24	08/26/11 11:00
CH082511SW-4	1108070-04	Wipe	08/25/11 13:32	08/26/11 11:00
CH082511SW-5	1108070-05	Wipe	08/25/11 13:40	08/26/11 11:00
CH082511SW-6	1108070-06	Wipe	08/25/11 13:44	08/26/11 11:00
CH082511SW-7	1108070-07	Wipe	08/25/11 13:53	08/26/11 11:00
CH082511SW-8	1108070-08	Wipe	08/25/11 14:00	08/26/11 11:00
CH082511SW-9	1108070-09	Wipe	08/25/11 14:38	08/26/11 11:00
CH082511SW-10	1108070-10	Wipe	08/25/11 14:44	08/26/11 11:00
CH082511SW-11	1108070-11	Wipe	08/25/11 14:51	08/26/11 11:00

SDG ID 11238B

PCB wipe extraction: Wipes were transferred from the sample vial to soxhlet extraction apparatus. The sample vials were subsequently rinsed with dichloromethane and the rinsate added to the soxhlet. Sample wipes 1108070-01 through -08 were soiled with black stains, and wipes -09 through -11 appeared clean. Samples -04, -06, and -08 contained small debris particles.

Surrogate spike compounds: Tetrachloro-m-xylene and decachlorobiphenyl were added to each wipe sample as surrogate standards. Only decachlorobiphenyl was evaluated for QC flagging. Tetrachloro-m-xylene is used as a secondary surrogate and only evaluated when the presence of decachlorobiphenyl is suspected in the sample itself (as when aroclor 1268 is present in the sample).

Reporting units: All results are reported in ug/100 cm2, based on the assumption that a 100 cm2 area was wiped.

Work Order(s)

1108070

United States Environmental Protection Agency
Region 9 Laboratory
1337 S. 46th Street, Building 201, Richmond, CA 94804
Phone:(510) 412-2300 Fax:(510) 412-2302

Project Manager: Jennifer Downey	**RCRA Enforcement Office**	**SDG:** 11238B
Project Number: R11R08	**75 Hawthorne Street**	**Reported:** 09/22/11 15:35
Project: Clean Harbors Los Angeles 2011 TSCA Inspection	**San Francisco CA, 94105**	

Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID: 1108070-01									**Wipe - Sampled: 08/25/11 13:16**
Sample ID: CH082511SW-1									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/01/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1260		ND	J, Q2, U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			89 %	*88.8-128%*		"	"	"	
Surrogate: Decachlorobiphenyl			80 %	*47.4-136%*		"	"	"	
Lab ID: 1108070-02									**Wipe - Sampled: 08/25/11 13:21**
Sample ID: CH082511SW-2									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/01/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1260		ND	J, Q2, U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			91 %	*88.8-128%*		"	"	"	
Surrogate: Decachlorobiphenyl			82 %	*47.4-136%*		"	"	"	
Lab ID: 1108070-03									**Wipe - Sampled: 08/25/11 13:24**
Sample ID: CH082511SW-3									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/01/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1260		ND	J, Q2, U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335

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Project Manager: Jennifer Downey	**RCRA Enforcement Office**	**SDG:** 11238B
Project Number: R11R08	**75 Hawthorne Street**	**Reported:** 09/22/11 15:35
Project: Clean Harbors Los Angeles 2011 TSCA Inspection	**San Francisco CA, 94105**	

Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID: 1108070-03									**Wipe - Sampled: 08/25/11 13:24**
Sample ID: CH082511SW-3									**Polychlorinated Biphenyls by EPA Method 8082A**
Surrogate: Tetrachloro-m-xylene		92 %		*88.8-128%*		*B1H0152*	*08/30/11*	*09/01/11*	
Surrogate: Decachlorobiphenyl		84 %		*47.4-136%*		"	"	"	
Lab ID: 1108070-04									**Wipe - Sampled: 08/25/11 13:32**
Sample ID: CH082511SW-4									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/01/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1260	RE1	6.5		0.5	"	"	"	09/07/11	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	09/01/11	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene		81 %		*88.8-128%*		"	"	"	
Surrogate: Decachlorobiphenyl		75 %		*47.4-136%*		"	"	"	
Lab ID: 1108070-05									**Wipe - Sampled: 08/25/11 13:40**
Sample ID: CH082511SW-5									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/01/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1260		ND	J, Q2, U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene		89 %		*88.8-128%*		"	"	"	
Surrogate: Decachlorobiphenyl		81 %		*47.4-136%*		"	"	"	
Lab ID: 1108070-06									**Wipe - Sampled: 08/25/11 13:44**
Sample ID: CH082511SW-6									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/01/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		0.4		0.1	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335

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Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID: 1108070-06									**Wipe - Sampled: 08/25/11 13:44**
Sample ID: CH082511SW-6									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1260		ND	J, Q2, U	0.1	ug/100cm²	B1H0152	08/30/11	09/01/11	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			89 %	*88.8-128%*		"	"	"	
Surrogate: Decachlorobiphenyl			87 %	*47.4-136%*		"	"	"	
Lab ID: 1108070-07									**Wipe - Sampled: 08/25/11 13:53**
Sample ID: CH082511SW-7									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/02/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1260		0.06	C1, J, Q2	0.1	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			90 %	*88.8-128%*		"	"	"	
Surrogate: Decachlorobiphenyl			81 %	*47.4-136%*		"	"	"	
Lab ID: 1108070-08									**Wipe - Sampled: 08/25/11 14:00**
Sample ID: CH082511SW-8									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/02/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1260		0.2	J, Q2	0.1	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			95 %	*88.8-128%*		"	"	"	
Surrogate: Decachlorobiphenyl			80 %	*47.4-136%*		"	"	"	
Lab ID: 1108070-09									**Wipe - Sampled: 08/25/11 14:38**
Sample ID: CH082511SW-9									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/02/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.1	"	"	"	"	8082A/SOP335

United States Environmental Protection Agency
Region 9 Laboratory
1337 S. 46th Street, Building 201, Richmond, CA 94804
Phone:(510) 412-2300 Fax:(510) 412-2302

Project Manager: Jennifer Downey	**RCRA Enforcement Office**	**SDG:** 11238B
Project Number: R11R08	**75 Hawthorne Street**	**Reported:** 09/22/11 15:35
Project: Clean Harbors Los Angeles 2011 TSCA Inspection	**San Francisco CA, 94105**	

Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID: 1108070-09									**Wipe - Sampled: 08/25/11 14:38**
Sample ID: CH082511SW-9									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1242		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/02/11	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1260		ND	J, Q2, U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			92 %	*88.8-128%*		"	"	"	
Surrogate: Decachlorobiphenyl			80 %	*47.4-136%*		"	"	"	
Lab ID: 1108070-10									**Wipe - Sampled: 08/25/11 14:44**
Sample ID: CH082511SW-10									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/02/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1260		ND	J, Q2, U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			91 %	*88.8-128%*		"	"	"	
Surrogate: Decachlorobiphenyl			81 %	*47.4-136%*		"	"	"	
Lab ID: 1108070-11									**Wipe - Sampled: 08/25/11 14:51**
Sample ID: CH082511SW-11									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.1	ug/100cm²	B1H0152	08/30/11	09/02/11	8082A/SOP335
Aroclor 1221		ND	U	0.2	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1260		ND	J, Q2, U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.1	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.1	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			90 %	*88.8-128%*		"	"	"	
Surrogate: Decachlorobiphenyl			83 %	*47.4-136%*		"	"	"	

United States Environmental Protection Agency
Region 9 Laboratory
1337 S. 46th Street, Building 201, Richmond, CA 94804
Phone:(510) 412-2300 Fax:(510) 412-2302

Project Manager: Jennifer Downey	**RCRA Enforcement Office**	**SDG:** 11238B
Project Number: R11R08	**75 Hawthorne Street**	**Reported:** 09/22/11 15:35
Project: Clean Harbors Los Angeles 2011 TSCA Inspection	**San Francisco CA, 94105**	

Quality Control

Analyte	Result	Qualifiers / Comments	Quantitation Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B1H0152 - Soxhlet Extraction - PCBs										**Prepared: 08/30/11 Analyzed: 09/01/11**
										Polychlorinated Biphenyls by EPA Method 8082A - Quality Control
Blank (B1H0152-BLK1)										
Aroclor 1016	ND	U	0.1	ug/100cm³						
Aroclor 1221	ND	U	0.2	"						
Aroclor 1232	ND	U	0.1	"						
Aroclor 1242	ND	U	0.1	"						
Aroclor 1248	ND	U	0.1	"						
Aroclor 1254	ND	U	0.1	"						
Aroclor 1260	ND	J, Q2, U	0.1	"						
Aroclor 1262	ND	U	0.1	"						
Aroclor 1268	ND	U	0.1	"						
Surrogate: Tetrachloro-m-xylene	*0.180*			"	*0.200*		90	*88.8-128*		
Surrogate: Decachlorobiphenyl	*0.167*			"	*0.200*		84	*47.4-136*		
LCS (B1H0152-BS1)										
Aroclor 1016	0.892		0.1	ug/100cm³	1.00		89	88.6-139		200
Aroclor ~~1260~~	0.847		0.1	"	1.00		85	86.5-139		200
Surrogate: Tetrachloro-m-xylene	*0.175*			"	*0.200*		88	*88.8-128*		
Surrogate: Decachlorobiphenyl	*0.167*			"	*0.200*		84	*47.4-136*		

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1337 S. 46th Street, Building 201, Richmond, CA 94804
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Project Manager: Jennifer Downey	**RCRA Enforcement Office**	**SDG:** 11238B
Project Number: R11R08	**75 Hawthorne Street**	**Reported:** 09/22/11 15:35
Project: Clean Harbors Los Angeles 2011 TSCA Inspection	**San Francisco CA, 94105**	

Qualifiers and Comments

Q2 The laboratory control standard associated with this sample did not meet recovery criteria for this analyte (see LCS results for this batch in QC summary).

J The reported result for this analyte should be considered an estimated value.

C1 The reported concentration for this analyte is below the quantitation limit.

U Not Detected

NR Not Reported

RE1, RE2, etc: Result is from a sample re-analysis.

United States Environmental Protection Agency
Washington, D.C. 20460

EPA

Toxic Substances Control Act

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

1. Investigation Identification			2. Time	3. Firm Name
Date: 8/25/11	Inspector No.: F15633	Daily Seq. No.: 1	11:12 AM	Clean Harbors Los Angeles LLC
4. Inspector Address				5. Firm Address
USEPA Region 9 - 75 Hawthorne St. San Francisco, CA 94105 (WST-3				5756 Alba Street Los Angeles, CA 90058

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to *(Check appropriate blocks):*

- ☐ A. Financial data
- ☐ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature		Recipient Signature	
Name: Jennifer Downey		Name: R. M. EARDLEY JR.	
Title: Env. Scientist	Date Signed: 8/25/11	Title: GENERAL MANAGER	Date Signed: 8-25-11

EPA 7740-3 Rev (8-91)

Regional Office

EPA

WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

OMB No. 2070-0007*
Approval expires 10-31-92

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 3-5	INSPECTOR NO. E15633	DAILY SEQ. NO. 1	[illegible] Los Angeles LLC
3. INSPECTOR NAME [illegible]			4. FIRM ADDRESS 5756 Alba Street [illegible] 90058
5. INSPECTOR ADDRESS USEPA Region 9 75 Hawthorne St. [illegible] San Francisco, CA 94105			6. CHIEF EXECUTIVE OFFICER NAME [illegible] 7. TITLE CEO/President

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE: I have received and read the notice		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.
SIGNATURE [illegible]		NAME
NAME [illegible]		TITLE
TITLE [illegible]	DATE SIGNED 3-5-11	ADDRESS

EPA Form 7740-4 (12-82)

REGIONAL OFFICE

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME
DATE: 8/25/11	INSPECTION NO.: FI5633	DAILY SEQ. NO.: 1	Clean Harbors Los Angeles LLC
3. INSPECTOR ADDRESS: USEPA Region 9 75 Hawthorne Street San Francisco, CA 94105			4. COMPANY ADDRESS: 5756 Alba Street Los Angeles, CA 90058

For internal EPA use. Copies of this form may be provided to recipient as acknowledgement of the documents and samples of chemical substances and/or mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
1	Clean Harbors Site Map
11	PCB wipe samples – Warehouse + Lab
1	Inventory List for PCBs in Bays 1-6 as of 8/25/11
1	Profile and analytical for Drum 24612696; Profile LASCE-0174
1	Decon procedures / Analytical (before and After) / Manifests outgoing for a Feb 2011 tank contaminated w/ PCBs

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐ NOT REQUESTED ☐ Requested but not possible ☒

INSPECTOR SIGNATURE		CLAIMANT SIGNATURE	
NAME: Jennifer Downey		NAME: DAVID COCHRAN	
TITLE: Env. Scientist	DATE SIGNED: 8/25/11	TITLE: GENERAL MANAGER	DATE SIGNED: 8-25-11

ENVIRONMENTAL PROTECTION AGENCY
Region 9 Laboratory

CHAIN OF CUSTODY RECORD

1337 S. 46th St., Bldg. 201
Richmond, CA 94804-4698

PROJ. NO.: RCRA02245V1 | PROJECT NAME: Clean Harbors TSCA PCB Inspection 8/25/11

SAMPLERS: (Signature)

DATE	TIME	MATRIX	COMP.	GRAB	SAMPLE IDENTIFICATION	NO. OF CONTAINERS	Total PCBs	REMARKS
8/25/11	1:16	Wipe		✓	CH082511SW-1	1	✓	Warehouse floor
8/25/11	1:21	Wipe		✓	CH082511SW-2	1	✓	Entrance
8/25/11	1:24	Wipe		✓	CH082511SW-3	1	✓	Ramp
8/25/11	1:32	Wipe		✓	CH082511SW-4	1	✓	Leaky transformer
8/25/11	1:40	Wipe		✓	CH082511SW-5	1	✓	Bay 1
8/25/11	1:44	Wipe		✓	CH082511SW-6	1	✓	Bay 4
8/25/11	1:53	Wipe		✓	CH082511SW-7	1	✓	Bay 2
8/25/11	2:00	Wipe		✓	CH082511SW-8	1	✓	Bay 3
8/25/11	2:38	Wipe		✓	CH082511SW-9	1	✓	Lab Hood #1
8/25/11	2:44	Wipe		✓	CH082511SW-10	1	✓	Lab Hood #1
8/25/11	2:51	Wipe		✓	CH082511SW-11	1	✓	Lab Hood #2

Relinquished by: (Signature)	Date / Time	Received by: (Signature)
	8/25/11 4:20 PM	
Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Received for Laboratory by: (Signature)	Date / Time	Temp. / Seals Intact (Y/N)

Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Conditions / Remarks		

Distribution: Original Accompanies Shipment; Copy to Coordinator Field Files

9-2881

Attachment 4

Clean Harbors
5657 Alba Street
Los Angeles, CA 90058

323.277.2500
800.282.0058
www.cleanharbors.com

October 4, 2011

VIA EMAIL (Delivery notification requested)

Mr. Christopher Rollins
U.S. EPA, Region IX
WST-3
75 Hawthorne Street
San Francisco, CA 94105

RE: Clean Harbors Los Angeles, LLC – TSCA Inspection August 25, 2011

Dear Mr. Rollins:

This letter is to update you in regards to the facility inspection conducted at Clean Harbors Los Angeles, LLC on August 25, 2011. Based upon your observations and inspection findings, we conducted some additional due diligence on the matters you raised during the post-inspection briefing and would like to share our findings with you, for the record:

1. During the facility inspection, it was observed that Drum# 24612696 had the speculative statement *"Assume >500"* written on the drum lid, by the generator. We have contacted the generator in order to determine the PCB source of contamination as it is our usual practice to learn as much about the waste characterization and source before we manage PCB waste at our TSCA- permitted facilities. While we are awaiting confirmation from the TSCA waste generator, Clean Harbors Los Angeles, LLC decided to sample and analyze the contents of the 55-gallon drum to determine the chemical concentration of PCB in this container, utilizing USEPA approved laboratory analytical methods. The sample was sent to Advanced Technology Laboratories, an independent, NELAP and California-certified laboratory, for PCB analysis. *The results of the analysis indicate there were no detectable PCBs.* A copy of the Advanced Technologies Laboratory report is enclosed for verification purposes.

2. During the facility inspection, the contents of a laboratory waste accumulation drum was questioned. Although we believe that the laboratory waste accumulation drum was in compliance with applicable RCRA and TSCA requirements, we have decided to re-train our TSCA facility laboratory teams on all Clean Harbors Laboratory Waste Standards of Operation (SOPs), to include waste container labeling requirements and waste classification under applicable State and Federal Rules and regulations.

[redacted]

CleanHarbors

3. During the facility inspection, you collected 10 wipe samples from floor areas that were discolored or stained to determine if these areas were impacted by PCB spills. We also collected 2 additional split samples from each area you sampled, and sent one set of our split sampled to a California approved and certified laboratory for analysis in accord with the TSCA requirements. The results of analysis indicates all samples tested below the TSCA surface contamination standard (<10 $\mu g/100cm^2$) with the highest sample result being 2.2 $\mu g/100cm^2$. A copy of our laboratory report is also enclosed.

During the meeting, you requested four items from us. The site map was provided in the meeting and the remaining items are included in the email. These items include, the inventory for Bays 1 thru 6 as of 8/25/11; profile and analytical for drum 24612696 (profile LASCE-0174); and the decontamination procedures, manifests and analytical for the February 2011 tank contamination.

In summary, we believe that we have faithfully responded to your concerns. We have also provided additional technical and analytical information, specific your inspection observations, which should assist you as you complete your inspection report.

Please do not hesitate to contact me if you have any further questions concerning this correspondence and especially the analytical data enclosed with this correspondence. I can be reached at (323) 277-2521 or via email at cochrand@cleanharbors.com.

Sincerely,

Dave Cochran
Facility Manager

[redacted]

Clean Harbors TSCA Cleanup for Non-TSCA Tank

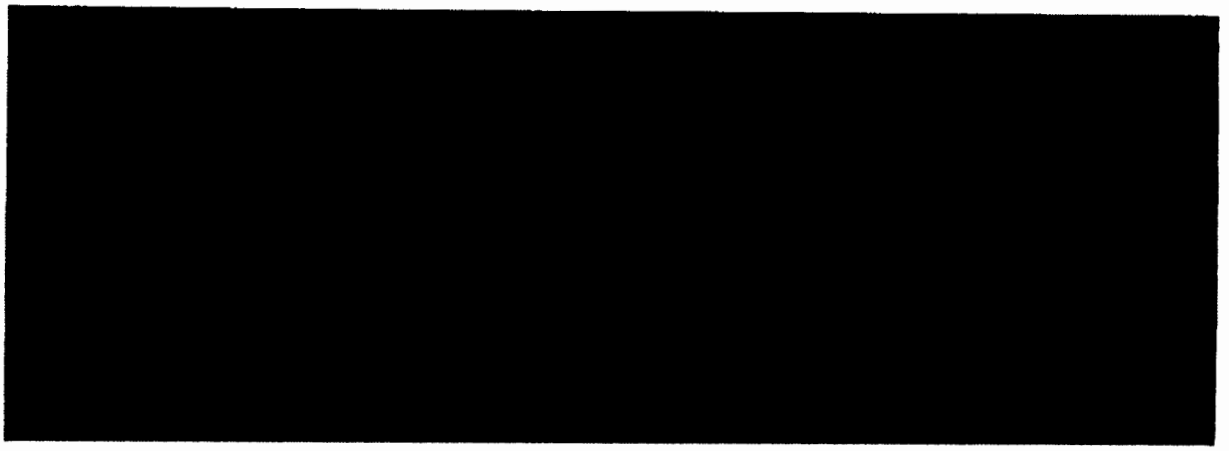
2/17/11 – tote with 40 gallons oil of 242 ppm oil was mistakenly pumped into tank V-10. Tank V-10 normally has oil <50 ppm.

2/22/11 – after reviewing lab analyticals, it was discovered that TSCA oil had been pumped into tank V-10. The tank, piping, pump and hoses used for pumping the tote were all closed off at this time as they were deemed TSCA contaminated. Even though analytical results showed that the oil in V-10 was 5.7 ppm, the 10,000 gallons in the tank were considered TSCA because of contact with the oil mentioned above. We began to use a pump with other hoses to continue pumping <50 oil into a separate tank. That processing could continue. No oil had been removed from tank V-10 between 2/17 and 2/22/11.

2/23/11 – arrangements were being made to properly dispose of the contaminated oil as well as decon the tank, piping, pump, and hoses. There was no spill of TSCA oil, so decon procedures were being applied to those things that had touch ed the oil.

2/24/11 – The 10,000 gallons were pumped into 2 isotainers to be shipped via rail to Clean Harbors PPM in Coffeyville, KS. 5,800 gallons were put into one isotainer and the other 4,200 gallons were put into. Once tank V-10 was emptied, it was time for the decontamination process of the tank, pump, hoses, and piping. As per federal regulations in CFR 761.79, 2000 gallons of a cleaning solvent with <50 ppm PCB was used to decon the tank and other equipment. Because the tank has a capacity of 20,000 gallons, 2000 gallons of mineral oil with <50 ppm PCB were used for decontamination. The cleaning solvent was flushed into the tank through the pump, piping and hoses that were used to pump the original 242 ppm PCB oil into tank V-10. The cleaning solvent was put in the tank from the top to ensure it cleaned the walls of the tank. This process was done three times with this solvent to insure the tank was cleaned. After each cleaning/flushing, a sample was taken of the solvent to check the PCB content. The results of the first cleaning was 4.2 ppm. The solvent after the second cleaning was 4.8 ppm. The third cleaning took place after the second result was confirmed. The third sample was taken and then analyzed in the evening by the lab.

2/25/11 – Upon arrival on the next day, the sample results for the last cleaning was ready with a reading of 5.3 ppm. We reviewed that all the piping, hoses and pump had been part of the tank cleanout for all three flushings and that it was ready to be returned to service. The tank, piping, pump and hoses were all deemed as non-porous. The isotainers containing the now TSCA oil were shipped to the railcar. At the Clean Harbors Coffeyville facility, the oil will be put through a dechloration process to remove all PCBs from the oil. After everything was reviewed to make sure the cleaning process had been done properly, the tank and equipment were returned to normal service.



CleanHarbors
ENVIRONMENTAL SERVICES, INC.

TSCA Tank Rinse Log

A. **Tank ID** V-10

B. **Tank Capacity** 20000 **gallons**

C. **Date Rinsed** 2/24/2011

D. **Type of Rinsate Used** **mineral oil <50 ppm PCB**

E. **Rinsate Volume** 2025 **gallons**
(3 rinses x 0.1 x Tank Capacity)

F. **Rinse System GPM** 45 **gal/minute**

G. **Minimum Rinse Time Req'd** 45 **minutes**
(Rinse Vol Req'd/ Rinse System GPM)

H. **Actual Rinse Time**

Start Time 7:15AM

Stop Time 8:00AM

Elapsed Time 45 min.

I. **Rinse Performed By** JV (initials)

J. **Rinsate Analytical Results**

Sample ID:	**V-10-1**	**Sample ID:**		**Sample ID:**	
Test Result:	4.2 ppm	**Test Result:**	ppm	**Test Result:**	ppm

K. **Tank Interior Inspected**
Released By JV (initials)

[redacted]

CleanHarbors
ENVIRONMENTAL SERVICES, INC.

TSCA Tank Rinse Log

A. **Tank ID** V-10

B. **Tank Capacity** 20000 **gallons**

C. **Date Rinsed** 2/24/2011

D. **Type of Rinsate Used** **mineral oil <50 ppm PCB**

E. **Rinsate Volume** 2025 **gallons**
(3 rinses x 0.1 x Tank Capacity)

F. **Rinse System GPM** 45 **gal/minute**

G. **Minimum Rinse Time Req'd** 45 **minutes**
(Rinse Vol Req'd/ Rinse System GPM)

H. **Actual Rinse Time**

Start Time 10:10AM

Stop Time 10:55AM

Elapsed Time 45 min.

I. **Rinse Performed By** JV (initials)

J. **Rinsate Analytical Results**

Sample ID:	**V-10-2**	**Sample ID:**		**Sample ID:**	
Test Result:	**4.8 ppm**	**Test Result:**	**ppm**	**Test Result:**	**ppm**

K. **Tank Interior Inspected**
Released By JV (initials)

[redacted]

CleanHarbors
ENVIRONMENTAL SERVICES, INC.

TSCA Tank Rinse Log

A. **Tank ID** V-10

B. **Tank Capacity** 20000 **gallons**

C. **Date Rinsed** 2/24/2011

D. **Type of Rinsate Used** **mineral oil <50 ppm PCB**

E. **Rinsate Volume** 2025 **gallons**
(3 rinses x 0.1 x Tank Capacity)

F. **Rinse System GPM** 45 **gal/minute**

G. **Minimum Rinse Time Req'd** 45 **minutes**
(Rinse Vol Req'd/ Rinse System GPM)

H. **Actual Rinse Time**

Start Time 1:20PM

Stop Time 2:05PM

Elapsed Time 45 min.

I. **Rinse Performed By** JV (initials)

J. **Rinsate Analytical Results**

Sample ID:	V-10-3	**Sample ID:**		**Sample ID:**	
Test Result:	5.3 ppm	**Test Result:**	ppm	**Test Result:**	ppm

K. **Tank Interior Inspected**
Released By JV (initials)

[redacted]

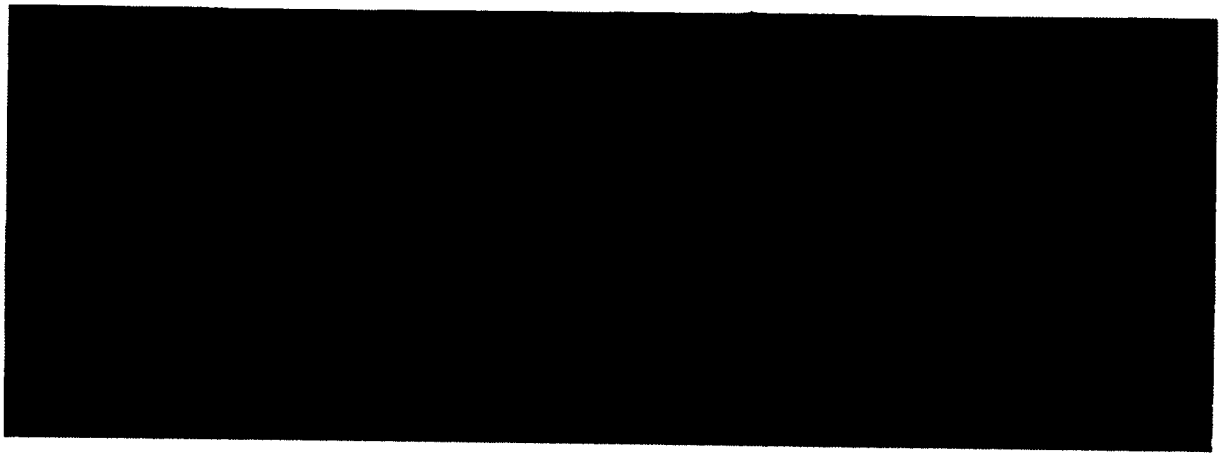
CLEAN HARBORS LOS ANGELES, LLC TSCA DECONTAMINATION OF TANK V-10

What Happened

A tote containing 40 gallons of oil that contained 242 ppm PCB was pumped by personnel into tank V-10 on 2/17/11. This tank normally contains oil <50 ppm PCB. This occurred due to employee error.
The problem was identified on 2/22/11 when the supervisor brought it to management's attention. At this time the facility ceased pumping into tank V-10 and closed it down by shutting down the valves. The pump, piping and hose used to pump the TSCA oil were shut down as well. From the time of the incident on 2/17/11 until the problem was discovered and the tank shut down on 2/22/11, only oil <50 ppm had been added to tank V-10. Nothing was removed from the tank during this same time period. At the time the tank was shut down, there was 8,100 gallons of oil inside. Due to the TSCA contact rule, all 8,100 gallons were considered TSCA regulated.
The EPA and California DTSC were notified on 2/22/11 of the incident.

Decontamination

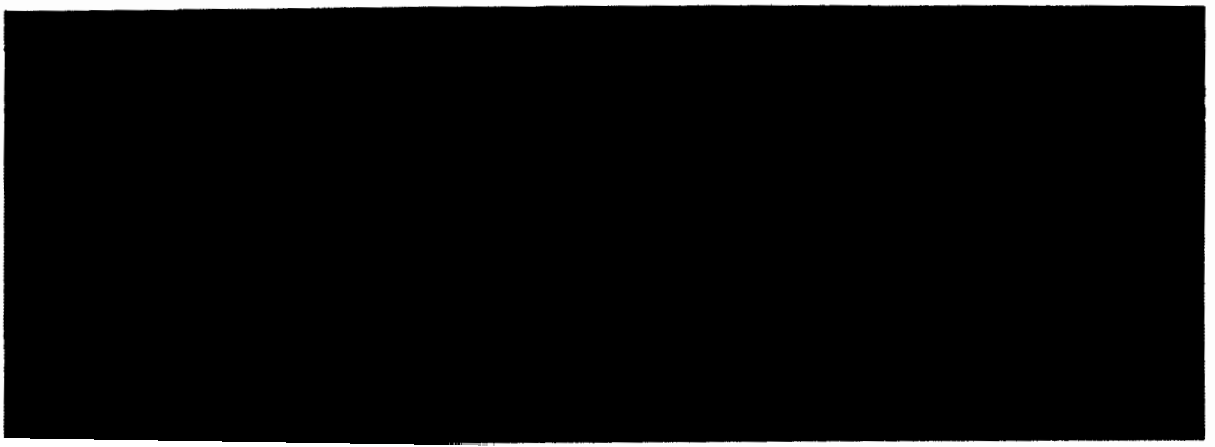
The 8,100 gallons of contaminated oil were pumped through the same pump and piping and hose into portable railcar containers for proper offsite disposal.
It was determined that the tank decontamination must take place according to 40 CFR 761.79 (c)(1) as the tank is a PCB container. Tank V-10 needed to be rinsed three times with a predetermined solvent. Mineral oil < 50 ppm PCB was to be used.



The items that needed decontamination here were the tank, the pump, and the piping. The hose was deemed to be made of porous material. We delegated the hose to be PCB and put it with other PCB equipment.
Approximately 2,025 gallons were used to decontaminate the tank. This satisfies the requirement that the volume of the rinsate solvent must be at least 10% of the volume of the container. The solvent was pumped from another tank through the contaminated piping and the contaminated pump. The solvent was put into the tank V-10 to rinse the walls. After the rinsing, a sample of the rinsate solvent was obtained to determine the current PCB level of the solvent. The PCB content of the solvent after the first rinse was 4.2 PPM. The solvent was removed from the tank. The tank was rinsed likewise a second time. Again, a sample was taken for analysis. The PPM level showed to be 4.8 ppm PCB for this solvent. This was done again a third time with the solvent. The result was 5.3 ppm for the third rinsing.
The tank, the piping, and the pump were considered decontaminate at this time.
The rinsate solvent was added to the railcar containers to be disposed of. Additional oil <50 ppm PCB was added to the last railcar container to make sure it was full.

Disposal

The material was put in these portable containers for rail. They were shipped to a railcar from the Clean Harbors Los Angeles facility and loaded on the railcar. The railcar was then shipped to the Clean Harbors PPM facility in Coffeyville, KS for disposal.



LS3372831 SC PPW 10/26/2010

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: CAD050808850
2. Page 1 of: 1
3. Emergency Response Phone: (800) 483-3748
4. Manifest Tracking Number: 003946222 FLE

5. Generator's Name and Mailing Address
Clean Harbors Los Angeles LLC
5756 Alba Street
Los Angeles, CA 90058
Generator's Phone: (323) 277-2800

Generator's Site Address (if different than mailing address): SAME

6. Transporter 1 Company Name: Clean Harbors Environmental Services Inc
U.S. EPA ID Number: MAD039322250

7. Transporter 2 Company Name: Union Pacific Railroad
U.S. EPA ID Number: NED001782810

8. Designated Facility Name and Site Address
Clean Harbors PPM LLC
2474 Highway 168 North
Coffeyville, KS 67337
Facility's Phone: (620) 251-8300
U.S. EPA ID Number: KSD981506025

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	RQ, UN2315, POLYCHLORINATED BIPHENYLS, LIQUID, (PCB CNL -2,499PPM), 9, PG III (PCB) O.S.D 2/14/11	001	TT	19773	K	261		
	2.							
	3.							
	4.							

CR
FS
CFFC

14. Special Handling Instructions and Additional Information
1. DH1-INTER ERG#171 UN# 930101
PO#SECN4936760

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. 2205C

Generator's/Offeror's Printed/Typed Name: NINA Lee
Signature: [signature]
Month: 02 Day: 25 Year: 11

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: FRANCISCO CARDENAS
Signature: [signature]
Month: 02 Day: 25 Year: 11

Transporter 2 Printed/Typed Name: Cory Barrett for Bobbie Hoems
Signature: [signature]
Month: 2 Day: 25 Year: 11

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Received 5781 gals, 42433 lbs, 19288 kg
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H039 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Bobbie Hoems
Signature: [signature]
Month: 04 Day: 21 Year: 11

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.

[redacted]

[redacted]

LS3371145 SC PPW 10/26/2010

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD050806850	1	(800) 483-3718	003946221 FLE

GENERATOR

5. Generator's Name and Mailing Address: Clean Harbors Los Angeles LLC, 5756 Alba Street, Los Angeles, CA 90058

Generator's Phone: (323) 277-2500

Generator's Site Address (if different than mailing address): SAME

6. Transporter 1 Company Name: Clean Harbors Environmental Services Inc — U.S. EPA ID Number: MAD039322250

7. Transporter 2 Company Name: Union Pacific Railroad — U.S. EPA ID Number: NED001792910

8. Designated Facility Name and Site Address: Clean Harbors PPM LLC, 2474 Highway 169 North, Coffeyville, KS 67337 — U.S. EPA ID Number: KSD981506025

Facility's Phone: (620) 251-6380

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN2315, POLYCHLORINATED BIPHENYLS, LIQUID, (PCB OIL <500PPM), 9, PG II (PCB) O.S.D 1/26/2011	001	TT	~~42000~~ 19773	K	381
	2.					
	3.					
	4.					

CR / FS / OFFC

14. Special Handling Instructions and Additional Information

1. DH1-INTER ERG#171

ISO # BLCU5412704 UPCX ~~JPCX 90~~ 930101

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.

I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. 22060

Generator's/Offeror's Printed/Typed Name: Nina Hee — Signature: [signature] — Month Day Year: 1 26 11

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

Transporter signature (for exports only):

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Francisco Castaneda — Signature: [signature] — Month Day Year: 02 25 11

Transporter 2 Printed/Typed Name: Union Pacific Railroad by John S. Lindsey — Signature: [signature] on behalf of UPRR — 2 1 2011

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number: Received 5358 gals, 39381 lbs, 18078 K

18b. Alternate Facility (or Generator) — U.S. EPA ID Number:

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H039			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Bobbie Harms — Signature: [signature] — Month Day Year: 04 12 11

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.

CleanHarbors
ENVIRONMENTAL SERVICES, INC.
5656 Alba St.,
Los Angeles, CA. 90058
PH: (323) 277-2500 FAX: (323)-2772523

PCB ANALYTICAL REPORT

EPA METHOD 8082A

DATE : 08/25/11

REFERENCE : ALBA PLANT

CLIENT : CLEAN HARBORS ENVIRONMENTAL SERVICES

MATRIX : WIPE

SAMPLE NAME	LOCATION	LAB ID NO.	Received Date	Date Analyzed	QC BATCH	Dilution	RL	Unit	Result
CH082511SW-1	WAREHOUSE FLOOR	0811- 14672	8/25/2011	8/25/2011	082511WP	1	1	ug/100cm²	<1
CH082511SW-2	WAREHOUSE ENTRANCE	0811- 14673	8/25/2011	8/25/2011	082511WP	1	1	ug/100cm²	<1
CH082511SW-3	WAREHOUSE RAMP	0811- 14674	8/25/2011	8/25/2011	082511WP	1	1	ug/100cm²	<1
CH082511SW-4	LEAKY TRANSFORMER	0811- 14675	8/25/2011	8/25/2011	082511WP	1	1	ug/100cm²	2.2
CH082511SW-5	BAY 1	0811- 14676	8/25/2011	8/25/2011	082511WP	1	1	ug/100cm²	<1
CH082511SW-6	BAY 4	0811- 14677	8/25/2011	8/25/2011	082511WP	1	1	ug/100cm²	<1
CH082511SW-7	BAY 2	0811- 14678	8/25/2011	8/25/2011	082511WP	1	1	ug/100cm²	<1
CH082511SW-8	BAY 3	0811- 14679	8/25/2011	8/25/2011	082511WP	1	1	ug/100cm²	<1
CH082511SW-10	LAB HOOD #1 FLOOR	0811- 14680	8/25/2011	8/25/2011	082511WP	1	1	ug/100cm²	<1
CH082511SW-11	LAB HOOD #2 FLOOR	0811- 14681	8/25/2011	8/25/2011	082511WP	1	1	ug/100cm²	<1

RL- Reporting Limit

ANALYZED BY: BITIN VELASCO
Chemist

REVIEWED BY : EDGAR MILITAR
Laboratory Manager

August 29, 2011

Edgar Militar
Clean Harbors Environmental Services, Inc.
5756 Alba St.
Los Angeles, CA 90058-1946
TEL: (323) 277-2501
FAX: (323) 277-2523

ELAP No.: 1838
NELAP No.: 02107CA
CSDLAC No.: 10196
ORELAP No.: CA300003

Workorder No.: 119573

RE:

Attention: Edgar Militar

Enclosed are the results for sample(s) received on August 26, 2011 by Advanced Technology Laboratories . The sample(s) are tested for the parameters as indicated in the enclosed chain of custody in accordance with the applicable laboratory certifications.

Thank you for the opportunity to service the needs of your company.

Please feel free to call me at (562)989-4045 if I can be of further assistance to your company.

Sincerely,

Eddie F. Rodriguez
Laboratory Director

Advanced Technology Laboratories
3275 Walnut Avenue Signal Hill, CA 90755 Tel: 562 989-4045 Fax: 562 989-4040

[redacted]

Advanced Technology Laboratories Date: *29-Aug-11*

CLIENT: Clean Harbors Environmental Services, Inc.
Project:
Lab Order: 119573

CASE NARRATIVE

Analytical Comments for EPA 8082

Sample 119573-001A, surrogate recovery biased low possibly due to matrix interferences.

[redacted]

Advanced Technology Laboratories

ANALYTICAL RESULTS
Print Date: *29-Aug-11*

CLIENT: Clean Harbors Environmental Services, Inc.
Client Sample ID: 24612696
Lab Order: 119573
Collection Date: 8/26/2011 10:45:00 AM
Project:
Matrix: SOLID
Lab ID: 119573-001A

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
PCBS BY GC/ECD						
	EPA 3550B			**EPA 8082**		
RunID: GC4_110827A	QC Batch: 75167			PrepDate:	8/27/2011	Analyst: HL
Aroclor 1016	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1221	ND	99		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1232	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1242	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1248	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1254	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1260	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1262	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1268	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Surr: Decachlorobiphenyl	13.6	39-122	S	%REC	1	8/27/2011 07:45 PM
Surr: Tetrachloro-m-xylene	87.6	45-111		%REC	1	8/27/2011 07:45 PM

Qualifiers:

B	Analyte detected in the associated Method Blank	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	ND	Not Detected at the Reporting Limit
S	Spike/Surrogate outside of limits due to matrix interference		Results are wet unless otherwise specified
DO	Surrogate Diluted Out		

Advanced Technology Laboratories
3275 Walnut Avenue, Signal Hill, CA 90755 Tel: 562.989.4045 Fax: 562.989.4040

[redacted]

CLIENT: Clean Harbors Environmental Services, Inc.
Work Order: 119573
Project:

ANALYTICAL QC SUMMARY REPORT

TestCode: 8082_S

Sample ID: MB-75167	SampType: MBLK	TestCode: 8082_S	Units: µg/Kg	Prep Date: 8/27/2011	RunNo: 136130
Client ID: PBS	Batch ID: 75167	TestNo: EPA 8082	EPA 3550B	Analysis Date: 8/27/2011	SeqNo: 2230420

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	16									
Aroclor 1221	ND	16									
Aroclor 1232	ND	16									
Aroclor 1242	ND	16									
Aroclor 1248	ND	16									
Aroclor 1254	ND	16									
Aroclor 1260	ND	16									
Aroclor 1262	ND	16									
Aroclor 1268	ND	16									
Surr: Decachlorobiphenyl	16.665		16.67		100	39	122				
Surr: Tetrachloro-m-xylene	17.917		16.67		107	45	111				

Sample ID: LCS-75167	SampType: LCS	TestCode: 8082_S	Units: µg/Kg	Prep Date: 8/27/2011	RunNo: 136130
Client ID: LCSS	Batch ID: 75167	TestNo: EPA 8082	EPA 3550B	Analysis Date: 8/27/2011	SeqNo: 2230421

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	147.528	16	166.7	0	88.5	56	106				
Aroclor 1260	150.131	16	166.7	0	90.1	57	119				
Surr: Decachlorobiphenyl	14.728		16.67		88.4	39	122				
Surr: Tetrachloro-m-xylene	15.706		16.67		94.2	45	111				

Sample ID: 119581-001AMS	SampType: MS	TestCode: 8082_S	Units: µg/Kg	Prep Date: 8/27/2011	RunNo: 136130
Client ID: ZZZZZZ	Batch ID: 75167	TestNo: EPA 8082	EPA 3550B	Analysis Date: 8/27/2011	SeqNo: 2230422

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	159.630	16	166.7	0	95.8	48	115				
Aroclor 1260	172.620	16	166.7	0	104	48	133				
Surr: Decachlorobiphenyl	15.906		16.67		95.4	39	122				

Qualifiers:

- B Analyte detected in the associated Method Blank
- ND Not Detected at the Reporting Limit
- DO Surrogate Diluted Out
- E Value above quantitation range
- R RPD outside accepted recovery limits
- Calculations are based on raw values
- H Holding times for preparation or analysis exceeded
- S Spike/Surrogate outside of limits due to matrix interference

CLIENT: Clean Harbors Environmental Services, Inc.
Work Order: 119573
Project:

ANALYTICAL QC SUMMARY REPORT

TestCode: 8082_S

Sample ID: 119581-001AMS	SampType: MS	TestCode: 8082_S	Units: µg/Kg	Prep Date: 8/27/2011	RunNo: 136130
Client ID: ZZZZZZ	Batch ID: 75167	TestNo: EPA 8082	EPA 3550B	Analysis Date: 8/27/2011	SeqNo: 2230422

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Surr: Tetrachloro-m-xylene	16.476		16.67		98.8	45	111				

Sample ID: 119581-001AMSD	SampType: MSD	TestCode: 8082_S	Units: µg/Kg	Prep Date: 8/27/2011	RunNo: 136130
Client ID: ZZZZZZ	Batch ID: 75167	TestNo: EPA 8082	EPA 3550B	Analysis Date: 8/27/2011	SeqNo: 2230423

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	159.614	16	166.7	0	95.8	46	115	159.6	0.0100	20	
Aroclor 1260	172.209	16	166.7	0	103	46	133	172.6	0.238	20	
Surr: Decachlorobiphenyl	15.995		16.67		95.9	39	122		0	20	
Surr: Tetrachloro-m-xylene	16.744		16.67		100	45	111		0	0	

Qualifiers:

- B Analyte detected in the associated Method Blank
- ND Not Detected at the Reporting Limit
- DO Surrogate Diluted Out
- E Value above quantitation range
- R RPD outside accepted recovery limits

Calculations are based on raw values

- H Holding times for preparation or analysis exceeded
- S Spike/Surrogate outside of limits due to matrix interference

CleanHarbors WASTE MATERIAL PROFILE SHE

Clean Harbors Profile No. lasce-0174

A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION # CAD008906818 GENERATOR NAME: Southern California Edison

GENERATOR CODE (Assigned by Clean Harbors) INV0267A CITY Monrovia STATE/PROVINCE CA ZIP/POSTAL CODE 91016

ADDRESS 1218 South Fifth Ave Waste and Water Division 2n PHONE: (626) 302-4187

CUSTOMER CODE (Assigned by Clean Harbors) SOU1689 CUSTOMER NAME: Southern California Edison Company

ADDRESS PO Box 800 CITY Rosemead STATE/PROVINCE CA ZIP/POSTAL CODE 91770

B. WASTE DESCRIPTION

WASTE DESCRIPTION Debris/Soil, Unknown PCB level, Assumed >500ppm

PROCESS GENERATING WASTE: Spill Cleanup

IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER ? No

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE
- [x] SOLID WITHOUT FREE LIQUID
- [ ] POWDER
- [ ] MONOLITHIC SOLID
- [ ] LIQUID WITH NO SOLIDS
- [ ] LIQUID/SOLID MIXTURE
  - % FREE LIQUID
  - % SETTLED SOLID
  - % TOTAL SUSPENDED SOLID
- [ ] SLUDGE
- [ ] GAS/AEROSOL

NUMBER OF PHASES/LAYERS: 1 2 3 — % BY VOLUME (Approx.): TOP 0.00, MIDDLE 0.00, BOTTOM 0.00

VISCOSITY (If liquid present)
- 1 - 100 (e.g. Water)
- 101 - 500 (e.g. Motor Oil)
- 501 - 10,000 (e.g. Molasses)
- > 10,000

COLOR: varies

ODOR
- [x] NONE
- [ ] MILD
- [ ] STRONG
- Describe

BOILING POINT °F (°C)
- <= 95 (<=35)
- 96 - 100 (35-38)
- 101 - 129 (38-54)
- >= 130 (>54)

MELTING POINT °F (°C)
- < 140 (<60)
- 140-200 (60-93)
- [x] > 200 (>93)

TOTAL ORGANIC CARBON
- <= 1%
- [x] 1-9%
- >= 10%

FLASH POINT °F (°C)
- < 73 (<23)
- 73 - 100 (23-38)
- 101 -140 (38-60)
- 141 -200 (60-93)
- > 200 (>93)

pH
- <= 2
- 2.1 - 6.9
- [x] 7 (Neutral)
- 7.1 - 12.4
- >= 12.5

SPECIFIC GRAVITY
- < 0.8 (e.g. Gasoline)
- 0.8-1.0 (e.g. Ethanol)
- 1.0 (e.g. Water)
- 1.0-1.2 (e.g. Antifreeze)
- [x] > 1.2 (e.g. Methylene Chloride)

ASH
- [x] < 0.1
- 0.1 - 1.0
- 1.1 - 5.0
- 5.1 - 20.0
- > 20
- Unknown

BTU/LB (MJ/kg)
- < 2,000 (<4.6)
- [x] 2,000-5,000 (4.6-11.6)
- 5,000-10,000 (11.6-23.2)
- > 10,000 (>23.2)
- Actual:

D. COMPOSITION (List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN	–	MAX	UOM
ASPHALT	0.0000000	–	100.0000000	%
CABLE, MASONRY	0.0000000	–	100.0000000	%
CARDBOARD	0.0000000	–	100.0000000	%
CERAMIC	0.0000000	–	100.0000000	%
CITRUS BASED SOLVENTS	0.0000000	–	20.0000000	%
DEBRIS	0.0000000	–	100.0000000	%
DIESEL	0.0000000	–	5.0000000	%
DRAINED EQUIPMENT LAST CONT. PCB	0.0000000	–	100.0000000	%
GLASS	0.0000000	–	100.0000000	%
METAL PARTS, PIPES	0.0000000	–	100.0000000	%

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")? YES [x] NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM? YES [x] NO

DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING; ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL? YES [x] NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material. YES NO

Chemical disinfection or some other form of sterilization has been applied to the waste YES NO

I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS. YES NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED YES NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE. G15 SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE W002

[redacted]

E. CONSTITUENTS

Are these values based on testing or knowledge? ✔ Knowledge Testing

If based on knowledge, please describe in detail, the rationale applied to identify and characterize the waste material. Please include reference to Material Safety Data Sheets (MSDS) when applicable. Include the chemical or trade-name represented by the MSDS, and or detailed process or operating procedures which generate the waste.

pcb contaminated debris (<=500 ppm pcb)

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE
D004	ARSENIC	5.0				✔
D005	BARIUM	100.0				✔
D006	CADMIUM	1.0				✔
D007	CHROMIUM	5.0				✔
D008	LEAD	5.0				✔
D009	MERCURY	0.2				✔
D010	SELENIUM	1.0				✔
D011	SILVER	5.0				✔

RCRA	VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)
D018	BENZENE	0.5
D019	CARBON TETRACHLORIDE	0.5
D021	CHLOROBENZENE	100.0
D022	CHLOROFORM	6.0
D028	1,2-DICHLOROETHANE	0.5
D029	1,1-DICHLOROETHYLENE	0.7
D035	METHYL ETHYL KETONE	200.0
D039	TETRACHLOROETHYLENE	0.7
D040	TRICHLOROETHYLENE	0.5
D043	VINYL CHLORIDE	0.2
	SEMI-VOLATILE COMPOUNDS	
D023	o-CRESOL	200.0
D024	m-CRESOL	200.0
D025	p-CRESOL	200.0
D026	CRESOL (TOTAL)	200.0
D027	1,4-DICHLOROBENZENE	7.5
D030	2,4-DINITROTOLUENE	0.13
D032	HEXACHLOROBENZENE	0.13
D033	HEXACHLOROBUTADIENE	0.5
D034	HEXACHLOROETHANE	3.0
D036	NITROBENZENE	2.0
D037	PENTACHLOROPHENOL	100.0
D038	PYRIDINE	5.0
D041	2,4,5-TRICHLOROPHENOL	400.0
D042	2,4,6-TRICHLOROPHENOL	2.0
	PESTICIDES AND HERBICIDES	
D012	ENDRIN	0.02
D013	LINDANE	0.4
D014	METHOXYCHLOR	10.0
D015	TOXAPHENE	0.5
D016	2,4-D	10.0
D017	2,4,5-TP (SILVEX)	1.0
D020	CHLORDANE	0.03
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008

OTHER CONSTITUENTS	MAX	UOM	NOT APPLICABLE
BROMINE			✔
CHLORINE			✔
FLUORINE			✔
IODINE			✔
SULFUR			✔
POTASSIUM			✔
SODIUM			✔
AMMONIA			✔
CYANIDE AMENABLE			✔
CYANIDE REACTIVE			✔
CYANIDE TOTAL			✔
SULFIDE REACTIVE			✔

HOCs

✔ NONE
< 1000 PPM
>= 1000 PPM

PCBs

NONE
< 50 PPM
✔ >=50 PPM

IF PCBS ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

✔ YES NO

ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ✔ NO (If yes, explain)

CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCE	EXPLOSIVE	FUMING	✔ OSHA REGULATED CARCINOGENS
POLYMERIZABLE	RADIOACTIVE	REACTIVE MATERIAL	NONE OF THE ABOVE

[redacted]

F. REGULATORY STATUS

YES ☑ NO USEPA HAZARDOUS WASTE?

☑ YES NO DO ANY STATE WASTE CODES APPLY?

261

Texas Waste Code outs0021

YES ☑ NO DO ANY CANADIAN PROVINCIAL WASTE CODES APPLY?

YES ☑ NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?

LDR CATEGORY: Not subject to LDR
VARIANCE INFO:

YES ☑ NO IS THIS A UNIVERSAL WASTE?

YES ☑ NO IS THE GENERATOR OF THE WASTE CLASSIFIED AS CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)?

YES NO IS THIS MATERIAL GOING TO BE MANAGED AS A RCRA EXEMPT COMMERCIAL PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?

YES ☑ NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES NO IS THIS WASTE STREAM SUBJECT TO THE INORGANIC METAL BEARING WASTE PROHIBITION FOUND AT 40 CFR 268.3(C)?

YES ☑ NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES ☑ NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE > 77 KPA (11.2 PSIA)?

YES ☑ NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?

YES ☑ NO IS THE WASTE SUBJECT TO ONE OF THE FOLLOWING NESHAP RULES?

Hazardous Organic NESHAP (HON) rule (subpart G) Pharmaceuticals production (subpart GGG)

YES NO IF THIS IS A US EPA HAZARDOUS WASTE, DOES THIS WASTE STREAM CONTAIN BENZENE?

YES NO Does the waste stream come from a facility with one of the SIC codes listed under benzene NESHAP or is this waste regulated under the benzene NESHAP rules because the original source of the waste is from a chemical manufacturing, coke by-product recovery, or petroleum refinery process?

YES NO Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) >10 Mg/year?

What is the TAB quantity for your facility? ____ Megagram/year (1 Mg = 2.200 lbs)

The basis for this determination is: Knowledge of the Waste Or Test Data Knowledge Testing

Describe the knowledge

G. DOT/TDG INFORMATION

DOT/TDG PROPER SHIPPING NAME:

UN3432, POLYCHLORINATED BIPHENYLS, SOLID, 9, PG III

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY ONE TIME WEEKLY MONTHLY ☑ QUARTERLY YEARLY OTHER Other

☑ CONTAINERIZED
1-15 CONTAINERS/SHIPMENT
STORAGE CAPACITY:
CONTAINER TYPE:
CUBIC YARD BOX ☑ PALLET
TOTE TANK DRUM
OTHER: DRUM SIZE:

BULK LIQUID
GALLONS/SHIPMENT: 0 Min -0 Max GAL.

BULK SOLID
SHIPMENT UOM: TON YARD
TONS/YARDS/SHIPMENT: 0 Min - 0 Max

I. SPECIAL REQUEST

COMMENTS OR REQUESTS

GENERATOR'S CERTIFICATION

I certify that I am authorized to execute this document as an authorized agent. I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE	NAME (PRINT)	TITLE	DATE
sara.duvall@sce.com			

This waste profile has been submitted using Clean Harbors' electronic signature system.

*40 CFR Sec. 264.12 required notice:
As required by Federal Resource Conservation and Recovery Act regulations found in 40 CFR Part 264.12(b) and all equivalent State hazardous waste regulations, notice is hereby provided that at Clean Harbors facilities that may be used to treat, store, and /or dispose of the hazardous waste described on this waste profile have the appropriate permits and the capacity to manage these wastes.

Please note this profile must be submitted for re-evaluation if there has been a change in the waste generating process or when there have been changes in the chemical composition or physical characteristics of the material.

[redacted]

Addendum

D. COMPOSITION

CHEMICAL	MIN	–	MAX	UOM
PAPER	0.000000	–	100.000	%
PCBS	0.950000	–	100.000	%
PIPE	0.000000	–	100.000	%
PLASTIC	0.000000	–	100.000	%
SOIL	0.000000	–	100.000	%
WOOD	0.000000	–	100.000	%

[redacted]

Advanced Technology Laboratories

Date: *29-Aug-11*

CLIENT: Clean Harbors Environmental Services, Inc.
Project:
Lab Order: 119573

CASE NARRATIVE

Analytical Comments for EPA 8082

Sample 119573-001A, surrogate recovery biased low possibly due to matrix interferences.

Advanced Technology Laboratories *3275 Walnut Avenue, Signal Hill, CA 90755* *Tel: 562. 989.4045* *Fax: 562.989.4040*

[redacted]

Advanced Technology Laboratories

ANALYTICAL RESULTS

Print Date: *29-Aug-11*

CLIENT:	Clean Harbors Environmental Services, Inc.	**Client Sample ID:**	24612696
Lab Order:	119573	**Collection Date:**	8/26/2011 10:45:00 AM
Project:		**Matrix:**	SOLID
Lab ID:	119573-001A		

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
PCBS BY GC/ECD						
	EPA 3550B			**EPA 8082**		
RunID: GC4_110827A	QC Batch: 76167			PrepDate:	8/27/2011	Analyst: HL
Aroclor 1016	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1221	ND	99		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1232	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1242	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1248	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1254	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1260	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1262	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Aroclor 1268	ND	50		µg/Kg	1	8/27/2011 07:45 PM
Surr: Decachlorobiphenyl	13.6	39-122	S	%REC	1	8/27/2011 07:45 PM
Surr: Tetrachloro-m-xylene	67.6	45-111		%REC	1	8/27/2011 07:45 PM

Qualifiers:				
	B	Analyte detected in the associated Method Blank	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	ND	Not Detected at the Reporting Limit
	S	Spike/Surrogate outside of limits due to matrix interference		Results are wet unless otherwise specified
	DO	Surrogate Diluted Out		

Advanced Technology Laboratories *3275 Walnut Avenue, Signal Hill, CA 90755 Tel: 562. 989.4045 Fax: 562.989.4040*

[redacted]

CLIENT: Clean Harbors Environmental Services, Inc.
Work Order: 119573
Project:

ANALYTICAL QC SUMMARY REPORT

TestCode: 8082_S

Sample ID: MB-75167	SampType: MBLK	TestCode: 8082_S	Units: µg/Kg	Prep Date: 8/27/2011	RunNo: 136130
Client ID: PBS	Batch ID: 75167	TestNo: EPA 8082	EPA 3550B	Analysis Date: 8/27/2011	SeqNo: 2230420

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	16									
Aroclor 1221	ND	16									
Aroclor 1232	ND	16									
Aroclor 1242	ND	16									
Aroclor 1248	ND	16									
Aroclor 1254	ND	16									
Aroclor 1260	ND	16									
Aroclor 1262	ND	16									
Aroclor 1268	ND	16									
Surr: Decachlorobiphenyl	16.685		16.67		100	39	122				
Surr: Tetrachloro-m-xylene	17.917		16.67		107	45	111				

Sample ID: LCS-75167	SampType: LCS	TestCode: 8082_S	Units: µg/Kg	Prep Date: 8/27/2011	RunNo: 136130
Client ID: LCSS	Batch ID: 75167	TestNo: EPA 8082	EPA 3550B	Analysis Date: 8/27/2011	SeqNo: 2230421

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	147.528	16	166.7	0	88.5	56	106				
Aroclor 1260	150.131	16	166.7	0	90.1	57	119				
Surr: Decachlorobiphenyl	14.728		16.67		88.4	39	122				
Surr: Tetrachloro-m-xylene	15.706		16.67		94.2	45	111				

Sample ID: 119561-001AMS	SampType: MS	TestCode: 8082_S	Units: µg/Kg	Prep Date: 8/27/2011	RunNo: 136130
Client ID: ZZZZZZ	Batch ID: 75167	TestNo: EPA 8082	EPA 3550B	Analysis Date: 8/27/2011	SeqNo: 2230422

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	159.630	16	166.7	0	95.8	48	115				
Aroclor 1260	172.620	16	166.7	0	104	48	133				
Surr: Decachlorobiphenyl	15.906		16.67		95.4	39	122				

Qualifiers:

B Analyte detected in the associated Method Blank
ND Not Detected at the Reporting Limit
DO Surrogate Diluted Out
E Value above quantitation range
R RPD outside accepted recovery limits
Calculations are based on raw values
H Holding times for preparation or analysis exceeded
S Spike/Surrogate outside of limits due to matrix interference

CLIENT: Clean Harbors Environmental Services, Inc.
Work Order: 119573
Project:

ANALYTICAL QC SUMMARY REPORT

TestCode: 8082_S

Sample ID: 119581-001AMS	SampType: MS	TestCode: 8082_S	Units: µg/Kg	Prep Date: 8/27/2011	RunNo: 136130
Client ID: ZZZZZZ	Batch ID: 76167	TestNo: EPA 8082	EPA 3550B	Analysis Date: 8/27/2011	SeqNo: 2238422

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Surr: Tetrachloro-m-xylene	16.476		16.67		98.8	45	111				

Sample ID: 119581-001AMSD	SampType: MSD	TestCode: 8082_S	Units: µg/Kg	Prep Date: 8/27/2011	RunNo: 136130
Client ID: ZZZZZZ	Batch ID: 76167	TestNo: EPA 8082	EPA 3550B	Analysis Date: 8/27/2011	SeqNo: 2238423

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	159.614	16	166.7	0	95.8	48	115	159.6	0.0100	20	
Aroclor 1260	172.209	16	166.7	0	103	48	133	172.6	0.238	20	
Surr: Decachlorobiphenyl	15.995		16.67		95.9	39	122		0	20	
Surr: Tetrachloro-m-xylene	16.744		16.67		100	45	111		0	0	

Qualifiers:

- **B** Analyte detected in the associated Method Blank
- **E** Value above quantitation range
- **H** Holding times for preparation or analysis exceeded
- **ND** Not Detected at the Reporting Limit
- **R** RPD outside accepted recovery limits
- **S** Spike/Surrogate outside of limits due to matrix interference
- **DO** Surrogate Diluted Out

Calculations are based on raw values

Track No	Final Code	Age	Net Age	Area	Weight	Tracking Q Type	OSD	Inb Prof	Lab Comments & Instructions
24495547	D80D	57	57	'DW-1	22	1 CM		LASCE-017	BUSHING <2PPM; See drum 24495524
24653128	CHWR	35	35	'DW-1	100	100 CM	########	CH403578	SWITCH <500PPM; TSCA PCB's Do not ship out of the US
24653187	CHWR	35	35	'DW-1	40	40 CM	########	CH403578	SWITCH <500PPM; See drum 24653128
24653179	CHWR	35	35	'DW-1	100	100 CM	########	CH403578	SWITCH <500PPM; See drum 24653128
24653186	D80T	35	35	'DW-1	228	228 CM		CH445810	EMPTY POLE <5PPM, Drained NON TSCA transfomers.
24896829	CHDR	7	7	'DW-1	31	31 CM	########	LASCE-016	BUSHING 91PPM; See drum 24896814
24589595	CHCI	42	157	'DW-3	600	55 DM	########		pcb capacitors
24612696	CHSI	39	39	'DW-3	33	16 DM	7/2/2011	lasce-0174	pcb debris; metal rein metal wire metal valv pipe fittin; concrete reinforcing bar or pieces of concrete >3")?CONTAINS TSCA PCBs - DO NOT SHIP OUT OF THE COUNTRY. OSHA CARCINOGEN.'
24632678	CHSI	37	37	'DW-3	22	16 DM	7/3/2011	LASCE-007	PCB DEBRIS; PCBS, DO NOT SHIP OUT OF COUNTRY
24670128	CHSI	32	32	'DW-3	20	16 DM	########	lasce-0174	pcb debris; See drum 24612696
24861265	CHTR	10	10	'DW-3	1645	1645 CM	########	LASCE-003	POLE 60PPM; See drum 24762649
24861286	CHTR	10	10	'DW-3	1629	1629 CM	########	LASCE-003	POLE 85PPM; See drum 24762649
24394009	D80T	70	70	'DW-4	803	803 CM	########	dwptran-0	POLE 6PPM; Contains non TSCA PCBs. Do not ship out of U.S.Non-TSCA PCBs. Do not ship out of country
24625780	D80T	37	37	'DW 4	308	308 EA		CH505923	DRAINE POLE <2PPM
24659788	D80T	35	35	'DW-4	786	786 CM	########	dwptran-0	POLE 10PPM; See drum 24394009
24753078	D80T	23	23	'DW-4	546	546 CM	########	dwptran-0	POLE 12PPM; See drum 24394009
24753079	D80T	23	23	'DW-4	1200	1200 CM	########	dwptran-0	POLE 8PPM; See drum 24394009
24753080	D80T	23	23	'DW-4	679	679 CM	########	dwptran-0	POLE 16PPM; See drum 24394009
24753081	D80T	23	23	'DW-4	405	405 CM	########	dwptran-0	POLE 6PPM; See drum 24394009
24753085	D80T	23	23	'DW-4	601	601 CM	########	dwptran-0	POLE 8PPM; See drum 24394009
24753086	D80T	23	23	'DW-4	337	337 CM	########	dwptran-0	POLE 15PPM; See drum 24394009
24753087	D80T	23	23	'DW-4	637	637 CM	########	dwptran-0	POLE 8PPM; See drum 24394009
24753088	D80T	23	23	'DW-4	689	689 CM	########	dwptran-0	POLE 7PPM; See drum 24394009
24801919	CHTR	16	16	'DW-4	2787	2787 CM	########	DWPTRAN	POLE 330PPM; See drum 24688740
24801921	CHTR	16	16	'DW-4	2736	2736 CM	########	DWPTRAN	POLE 221PPM; See drum 24688740
24864781	CHTR	9	9	'DW-4	523	523 CM	########	LASCE-003	POLE 62PPM; See drum 24762649
24882446	CHTR	8	8	'DW-4	280	280 CM	########	LASCE-003	POLE 60PPM; See drum 24762649
24896855	CHTR	7	7	'DW-4	740	740 CM	########	LASCE-003	TRANSFORMER >50<499PPM PCBS (74 PPM); See drum 24762649
24688740	CHTR	30	30	'DW-5	2608	2608 CM	########	DWPTRAN	POLE 82PPM; TSCA-regulated PCBs. Do not ship out of country
24753089	D80T	23	23	'DW-5	703	703 CM	########	dwptran-0	POLE 12PPM; See drum 24394009
24753090	D80T	23	23	'DW-5	794	794 CM	########	dwptran-0	POLE 6PPM; See drum 24394009
24753091	D80T	23	23	'DW-5	675	675 CM	########	dwptran-0	POLE 19PPM; See drum 24394009
24753092	D80T	23	23	'DW-5	682	682 CM	########	dwptran-0	POLE 6PPM; See drum 24394009
24762649	CHTR	22	22	'DW-5	213	213 CM	8/4/2011	LASCE-003	POLE 94PPM; Contains TSCA PCBs. Do not ship out of U.S.TSCA PCBS, DO NOT SHIP OUT OF COUNTRYEVALUATE FO R PROCESS ON RECEIPT..OUTBOUND TO COFFEYVILLE ONLYThe contract with this cust
24805816	CHTR	16	16	'DW-5	740	740 CM	########	LASCE-003	TRANSFORMER >50<499PPM PCBS (56 PPM); See drum 24762649
24738908	D80D	24	24	'DW-6	150	150 CM	########	LASCE-017	BUSHING 44PPM; See drum 24721440
24738909	D80D	24	24	'DW-6	150	150 CM	########	LASCE-017	BUSHING 17PPM; See drum 24721440
24738910	D80D	24	24	'DW-6	150	150 CM	########	LASCE-017	BUSHING 33PPM; See drum 24721440
24738911	D80D	24	24	'DW-6	150	150 CM	########	LASCE-017	BUSHING 37PPM; See drum 24721440
24753077	D80T	23	23	'DW-6	670	670 CM	########	dwptran-0	POLE 5PPM; See drum 24394009
24753093	D80T	23	23	'DW-6	440	440 CM	########	dwptran-0	POLE 5PPM; See drum 24394009
24805647	CHTR	16	16	'DW-6	220	220 CM	########	DWPTRAN	pole 55PPM; See drum 24688740
24814144	D80T	15	15	'DW-6	1206	1206 CM	########	dwptran-0	pole 28ppm; See drum 24394009
24814145	D80T	15	15	'DW-6	1718	1718 CM	########	dwptran-0	pole 47ppm; See drum 24394009
24896818	CHDR	7	7	'DW-6	31	31 CM	########	LASCE-016	BUSHING 86PPM; See drum 24896814
24896819	CHDR	7	7	'DW-6	31	31 CM	########	LASCE-016	BUSHING 81PPM; See drum 24896814
24896820	CHDR	7	7	'DW-6	31	31 CM	########	LASCE-016	BUSHING 80PPM; See drum 24896814

:omer is done such that only transformers with all 50-499 ppm PCB may come in on this profile per Steven Peterson. Generator wishes to leave composition generic per Kathleen Gordo